

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
SOUTHERN DIVISION

MONICA DANIEL HUTCHISON,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No.: 09-3018-CV-S-RED
	)	
TEXAS COUNTY, MISSOURI,	)	
MICHAEL R. ANDERSON,	)	
TEXAS COUNTY PROSECUTING	)	
ATTORNEY, and	)	
MICHAEL R. ANDERSON, individually,	)	
	)	
Defendants.	)	

**DEFENDANT ANDERSON'S EXHIBIT LIST**

COMES NOW Defendant Michael Anderson, by and through counsel, and designates the following exhibits which he may use during the cross-examination of Plaintiff's witnesses or during his case in chief:

DEFENDANT'S EXHIBIT NO.	DESCRIPTION OF EXHIBIT
200	Plaintiff's Complaint filed January 21, 2009, excluding exhibits, 20 pages
201	Plaintiff's Second Amended Complaint, excluding exhibits, Defendant's deposition Exhibit 3, 25 pages
202	Monica Daniel Hutchison's application for employment, Defendant's deposition Exhibit 6, 2 pages
203	Texas County Personnel Administration Handbook, Defendant's deposition Exhibit 7, 22 pages

204	January 8, 2005 letter to Hutchison from Anderson, Defendant's deposition Exhibit 9, 2 pages
205	Certified copy of letter from Cynthia MacPherson to Douglas Kinde dated July 7, 2006, including facsimile transmission, 6 pages
206	Plaintiff's Answers to Texas County, Missouri's First Interrogatories Directed to Plaintiff, Defendant's Exhibit 4, 11 pages
207	Plaintiff's Answers to Defendant Anderson's First Interrogatories to Plaintiff, 12 pages
208	Plaintiff's Initial Rule 26(a) Disclosures, 7 pages
209	Plaintiff's Responses to Defendant Anderson's Request for Production of Documents, exclusive of attachments, 4 pages
210	Plaintiff's 2002 Federal and State Income Tax Returns, 8 pages
211	Plaintiff's 2003 Federal and State Income Tax Returns, 9 pages
212	Plaintiff's 2004 Federal and State Income Tax Returns, 10 pages
213	Plaintiff's 2005 Federal and State Income Tax Returns, 16 pages
214	Plaintiff's 2006 Federal and State Income Tax Returns, 16 pages
215	Plaintiff's 2007 Federal and State Income Tax Returns, 6 pages
216	Plaintiff's 2008 Federal and State Income Tax Returns, 22 pages
217	Plaintiff's 2009 Federal and State Income Tax Returns

- 218 Letter from Anderson to Commissioners dated August 9, 2005, Defendant's deposition Exhibit 10
- 219 Email from Anderson to Hutchison dated December 20, 2005, Defendant's deposition Exhibit 12, Plaintiff's deposition Exhibit 7, 2 pages
- 220 Resignation letter of Hutchison dated December 23, 2005, Defendant's deposition Exhibit 13, 1 page
- 221 Letter of Anderson to County Commission dated December 27, 2005, 1 page
- 222 Hutchison letter to the EEOC dated February 1, 2006, Defendant's deposition Exhibit 14<sup>1\*</sup>
- 223 Original letter of Hutchison to EEOC dated February 1, 2006, Defendant's deposition Exhibit 15\*
- 224 Color photograph of Monica Daniel Hutchison, Michael Anderson and Christy Wheeler at college graduation
- 225 US Department of Justice Civil Rights Division Notice of Right to Sue letter dated October 23, 2008, 1 page\*
- 226 Anderson letter to Harold Emde dated May 16, 2006\*
- 227 Press release from Anderson dated June 6, 2006
- 228 Thank you card with flower written by Anderson, 2 pages

---

<sup>1\*</sup>To be offered only if the court overrules defendant's objections regarding admissibility of evidence in the EEOC investigation.

- 229 With Special Thanks card and envelope from Carolyn Daniel and Monica Daniel Hutchison to Michael and Diane Anderson, 3 pages
- 230 Certified copy of court file for Anderson lawsuit against Hutchison and Williams, 21 pages
- 231 Filing fee check for Anderson lawsuit, 1 page
- 232 Certified records from Webster University regarding Monica Daniel Hutchison's transcript, 11 pages
- 233 Webster University 2005 - 2007 graduate studies catalog, excerpt, 7 pages
- 234 Certified employment records of Monica Daniel Hutchison from ALIVE, 4 pages
- 235 Certified employment records of Monica Daniel Hutchison from Great Circle, 64 pages
- 236 Certified employment records of Monica Daniel Hutchison from Missouri Department of Social Services, 51 pages
- 237 Certified employment records of Monica Daniel Hutchison from Pathways, 153 pages
- 238 Certified medical records of Monica Daniel Hutchison from Dr. David's Family Clinic, 17 pages
- 239 Certified medical records of Monica Daniel Hutchison from Dr. Anthony Tay, 10 pages
- 240 Certified prescription records of Monica Daniel Hutchison from Walgreens, 5 pages
- 241 Certified prescription records of Monica Daniel Hutchison from Wal-Mart, 7 pages
- 242 A copy of the Texas County court file regarding adult abuse petition filed by Mildred Williams against Michael Anderson, 12 pages

243	Letter from Anderson to Ted Bruce, Attorney General's office dated January 21, 2006, 2 pages
244	Attorney General forensic analysis report, 6 pages
245	Letter from Anderson to Craig Chavalle, Missouri Attorney General's office including fax cover page, 2 pages
246	Letter to Justin Glick, Missouri Attorney General's office dated January 12, 2006, 1 page
247	A copy of the Prosecuting Attorney's file regarding Danny McNew accident
248	Prosecuting Attorney's file regarding tickets issued to Justin James <sup>2**</sup>
249	Prosecuting Attorney's file regarding tickets issued to Devon James <sup>**</sup>
250	Texas County Commission Agenda dated December 8, 2005, 2 pages
251	Texas County Commission Agenda dated December 13, 2005, 2 pages
252	Texas County Commission Agenda dated December 27, 2005, 2 pages
253	Pay records for Monica Daniel Hutchison from Texas County, 7 pages
254	Employee list from Texas County for 2008 budget redacted showing Christy Wheeler's wage rate history

---

<sup>2\*\*</sup>To be offered in the even the court overrules objections to portions of James testimony.

255	Internet posting from <u>news-leader.com</u> dated July 19, 2006 regarding dismissal of lawsuit against Hutchison
256	Email from Monica Daniel Hutchison to Diane Anderson and others dated November 11, 2005 containing joke, 2 pages
257	Anderson notes for meeting with Monica Daniel Hutchison, Defendant's deposition Exhibit 23, 3 pages
258	Monica Daniel Hutchison's sketch of private law office, Defendant's Exhibit 14A
259	Copy of Section 56.110 RSMo
260	Copy of Missouri Rule of Professional Conduct 4-3.1 complete with comments, 1 page
261	Licking Police Department patrol log dated December 17, 2005
262	Investigative subpoena dated December 23, 2005
263	Bankruptcy schedules of Monica Daniel Hutchison, 36 pages
264	Copy of the deposition designations Stephanie Pounds
265	Copy of the deposition designations Dr. Dale Halfaker, MD
266	Copy of the deposition designations Mildred Williams
267	Copy of the deposition designations Monica Daniel Hutchison

268	Copy of the deposition counter-designations Harold Emde <sup>3***</sup>
269	Copy of the deposition counter-designations Seth Walker
270	Copy of the deposition counter-designations Dr. David Myers, DO
271	Copy of the deposition counter-designations Brad Eidson
272	Copy of the deposition counter-designations Brad Ellsworth
273	Copy of the deposition counter-designations Debbie James
274	Copy of the deposition counter-designations Terry Haden
275	Copy of the deposition counter-designations Danny McNew
276	Copy of the deposition counter-designations Jeff Kinder
277	Copy of the deposition counter-designations Jessica Sparks
278	Letter from Texas County Commission to Mildred Williams dated February 3, 2009
279	<i>Post Traumatic Stress Disorder and Litigation Guidelines for Forensic Assessment</i> , 2 <sup>nd</sup> Edition by Robert I. Simon, MD, 258 pages and excerpts therefrom
280	<i>Diagnostic and Statistical Manual of Mental Disorders</i> , 4 <sup>th</sup> Edition, Text Revision and excerpts therefrom, 943 pages

---

<sup>3\*\*\*</sup>To be offered only if the court overrules defendant's objections regarding admissibility of evidence in the EEOC investigation.

281	Records of Dina Vitoux through November 17, 2009, 5 pages
282	Report of Dina Vitoux, Defendant's deposition Exhibit 19, 18 pages <sup>4****</sup>
283	Plaintiff's Deposition Exhibit 50 Terry Haden's drawing of the prosecutor's office
284	List of treatises reviewed by Dr. Dale Halfaker <sup>5</sup> *****
285	Dr. Dale Halfaker's file*****
286	Report of Dr. Dale Halfaker, 66 pages*****
287	CV of Dr. Elizabeth Pribor, 8 pages
288	Report of Dr. Elizabeth Pribor, 33 pages
289	Washington University report of psychological testing prepared by Marcia McCabe, Ph.D., 3 pages
290	MMPI-II answer sheet, 2 pages
291	MCMI-III answers, 4 pages
292	MMPI-II questions, 17 pages
293	MMCI-III interpretive report, 8 pages
294	MMPI-II extended score report, 15 pages
295	Tape recording of Dr. Pribor's interview of Monica Daniel Hutchison
296	Notes of Dr. Elizabeth Pribor, 211 pages

---

<sup>4\*\*\*\*</sup>This exhibit is being offered only if the court overrules Defendant's objections to Ms. Vitoux's testimony

<sup>5\*\*\*\*\*</sup>Being offered only in the event the court overrules Defendant's motion to exclude or limit the testimony of Dr. Halfaker.



297 Petition in quo warranto against Jessica Sparks

298 Preliminary Order in quo warranto against Jessica Sparks

299 Cell phone records of Michael Anderson - if available, \_\_ pages

**TAYLOR, STAFFORD, CLITHERO,  
FITZGERALD & HARRIS, LLP**

/s/Warren E. Harris  
By \_\_\_\_\_  
Warren E. Harris  
Missouri Bar No. 40372  
[wharris@taylorstafford.com](mailto:wharris@taylorstafford.com)  
3315 E. Ridgeview, Suite 1000  
Springfield, MO 65804  
Tel: 417-887-2020  
Fax: 417-887-8431  
**COUNSEL FOR DEFENDANT  
ANDERSON**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 24<sup>th</sup> day of November 2010 the foregoing *Defendant Anderson's Designations of Dr. Dale Halfaker, Ph.D.'s Deposition* was electronically filed with the Clerk of the Court using the CM/ECF system which sent notification of such filing to counsel for Plaintiff, David L. Steelman and Corey L. Franklin.

/s/ Warren E. Harris  
\_\_\_\_\_  
Warren E. Harris